NRC 2003-0095

10 CFR 50.55a(g)(5)(iii)
10 CFR 50.55a(a)(3)(i)

October 10, 2003

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

POINT BEACH NUCLEAR PLANT, UNIT 2
DOCKET 50-301
REACTOR VESSEL CLOSURE HEAD PENETRATION REPAIR
RELIEF REQUESTS MR 02-018-1 AND MR 02-018-2
REQUEST FOR REVIEW OF ADDITIONAL TECHNICAL JUSTIFICATION

Reference: (1) NRC Safety Evaluation dated September 10, 2003 (TAC NOS. MB6185/8436)
(2) NRC Safety Evaluation dated September 24, 2003 (TAC NOS. MB6184/8438)

In reference 1, the NRC granted the relief proposed in Nuclear Management Company, LLC (NMC) Relief Request MR 02-018-2, from the requirement to characterize flaws that may exist in the remnants of the control rod drive mechanism (CRDM) nozzle J-groove welds after repair. In reference 2, the NRC granted the relief proposed in NMC Relief Request MR 02-018-1, to utilize an alternative method to the temper bead welding requirements of the 1989 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for reactor pressure vessel head-to-CRDM welds. The granted relief may become necessary in the event that flaws requiring repair in reactor vessel closure head (RVCH) penetrations are discovered during inspections, in accordance with our response to NRC Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs".

The relief granted in reference 1 does not apply to situations where portions of the new pressure boundary weld overlap onto portions of the remnant J-groove weld. Therefore, should it be necessary to perform repairs to the CRDM such that the new pressure boundary weld must overlap onto portions of the remnant J-groove weld, we would need to request relief for such a repair. Since any such relief would likely be requested under exigent conditions, we are therefore submitting technical justification for this type of repair so that it is readily available for the staff's review. This justification is contained in several calculation packages.

The following copies of the Structural Integrity Associates calculation packages are enclosed with this letter.

Calculation package PBCH-07Q-301, "Fracture Mechanics Evaluation of Point Beach Unit 2 Top Head CRDM 43.5 Degree Azimuth Penetration Weld Repair", dated October 2, 2003 (Non-Proprietary);

Calculation package PBCH-07Q-302, "PWSCC Crack Growth Correlations and Crack Growth Calculations for Point Beach Unit 2", dated October 9, 2003 (Non-Proprietary).

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The following copies of the proprietary versions of the Framatome ANP, LLC ("FRA-ANP") calculation packages are enclosed with this letter.

Calculation package 32-5017757-01, "PB-2 CRDM Nozzle IDTB Weld Anomaly Flaw Evaluations", dated September 26, 2003 (Proprietary);

Calculation package 32-5017758-01, "PB-2 CRDM Nozzle IDTB J-Groove Weld Flaw Evaluation", dated September 26, 2003 (Proprietary);

Calculation package 32-5017796-01, "Point Beach-2 CRDM Temper Bead Bore Weld Analysis", dated September 26, 2003 (Proprietary).

The non-proprietary versions of the FRA-ANP calculation packages will be provided separately.

Also included in the enclosures to this letter is a FRA-ANP proprietary authorization affidavit.

As Calculation Packages 32-5017757-01, 32-5017758-01, and 32-5017796-01 contain information proprietary to FRA-ANP, they are supported by an affidavit signed by FRA-ANP, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.790 of the Commission's regulations.

Accordingly, it is requested that the information, which is proprietary to FRA-ANP, be withheld from public disclosure in accordance with 10 CFR 2.790. Correspondence regarding the proprietary aspects of the items listed above, or the supporting FRA-ANP Affidavit, should reference the affidavit and be addressed to J. F. Mallay, Director Regulatory Affairs, Framatome ANP, Inc., 3315 Old Forest Road, P.O. Box 10935, Lynchburg, Virginia 24506-0935.

NMC requests that the NRC staff provide concurrence that it is acceptable to perform repairs to the PBNP Unit 2 CRDM, such that the new pressure boundary weld must overlap onto portions of the remnant J-groove weld, provided that PBNP Unit 2 remains in Modes 5 or 6 or defueled (as defined in PBNP Technical Specification 1.1) until such time as the staff may grant approval for such repairs. We request this concurrence by October 15, 2003. If necessary, NMC personnel will be available to meet with your staff to discuss any concerns you may have.

Any statements of intent made in this submittal are provided for information purposes and are not considered to be regulatory commitments.

A. J. Cayia
Site Vice President

LAS/kmd

Enclosures

cc: (with enclosures)
Project Manager, Point Beach Nuclear Plant, NRR, USNRC

cc: (w/o enclosures)
Regional Administrator, Region III, USNRC
NRC Resident Inspector - Point Beach Nuclear Plant
PSCW

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is James F. Mallay. I am Director, Regulatory Affairs, for Framatome ANP ("FANP"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by FANP to determine whether certain FANP information is proprietary. I am familiar with the policies established by FANP to ensure the proper application of these criteria.

3. I am familiar with the FANP information contained in three calculation summary sheets (32-5017758-01, 32-5017757-01, 32-5017796-01) being submitted to the NRC by Nuclear Management Company by letter number NRC 2003-0095 concerning the "Reactor Vessel Closure Head Penetration Repair" on the Point Beach Nuclear Plant, Unit 2. These three documents are referred to herein as "Documents." Information contained in these Documents has been classified by FANP as proprietary in accordance with the policies established by FANP for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by FANP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents be withheld from public disclosure.

6. The following criteria are customarily applied by FANP to determine whether information should be classified as proprietary:

(a) The information reveals details of FANP's research and development plans and programs or their results.

(b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.

(c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FANP.

(d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FANP in product optimization or marketability.

(e) The information is vital to a competitive advantage held by FANP, would be helpful to competitors to FANP, and would likely cause substantial harm to the competitive position of FANP.

7. In accordance with FANP's policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside FANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FANP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

SUBSCRIBED before me this 8th day of October, 2003.

Ella F. Carr-Payne
NOTARY PUBLIC, STATE OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/05

ELLA F. CARR-PAYNE
Notary Public
Commonwealth of Virginia
My Commission Expe. Aug. 31, 2005

ENCLOSURES

to

NRC 2003-0095

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